

## J. Ashley Cooper

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## **Via Electronic Filing**

Jocelyn G. Boyd Chief Clerk/Administrator **Public Service Commission of South Carolina** Post Office Drawer 11649 Columbia, SC 29211

Re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Dominion Energy South Carolina Inc.'s Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) – S.C. Code Ann. Section 58-41-20(A); Docket NO. 2019-184-E

Dear Ms. Boyd:

By Order No. 2020-244 (the "Order"), dated March 24, 2020, issued in the above-referenced docket, the Public Service Commission of South Carolina (the "Commission"), among other things, ordered Dominion Energy South Carolina, Inc. ("DESC") to "file proposed mitigation protocols for Commission consideration" that may reduce the Variable Integration Charge and Energy Integration Charge incurred by certain solar projects on DESC's system. The Order requires these mitigation protocols (the "Protocols") to be filed within 30 days after the date of the Order, but noted that DESC "may seek an extension if necessary."

As such, DESC respectfully requests that the Commission extend DESC's deadline to file the Protocols from April 23rd to June 1st. DESC's request for an initial extension is necessitated by the inherent complexity of developing Protocols that are not only applicable to a wide range of solar projects on DESC's system, but also adequately reduce the need for additional ancillary service requirements associated with variable, intermittent resources. The COVID-19 pandemic further complicates the development of the Protocols. DESC personnel are working remotely in order to comply with the increasingly-strict social-distancing guidelines implemented across the State of South Carolina, and developing the Protocols requires cross-department collaboration.

Although DESC remains diligent in its development of the Protocols, these realities necessitate an initial extension to ensure the Protocols appropriately address the concepts

outlined in the Order. Therefore, DESC respectfully requests that the Commission extend DESC's deadline to file the Protocols to June 1, 2020. Thank you for your assistance and consideration of this matter. If you have any questions, please do not hesitate to contact me at your convenience.

Sincerely,

J. Ashley Cooper

JAC:hmp

cc: (Via Electronic Mail)

All parties of record in Docket No. 2019-184-E